To: Seyfried, Erin[Seyfried.Erin@epa.gov]; Shaw, Hanh[Shaw.Hanh@epa.gov]; Kenknight, Jeff[Kenknight.Jeff@epa.gov]
From: Cool, Richard
Sent: Mon 12/8/2014 4:21:47 PM
Subject: FW: Discoverer deck drainage
Chukchi_General_Permit_AKG288100.pdf

FYI, Heather and Lana raised this issue to my attention after the formal Friday meeting adjourned. They expressed concern that Noble was overreacting to the USCG investigation but at their level, they are not sure where this potential reaction is coming from. They didn't ask for any immediate reaction but obviously they are probably looking at the GP Part II.C.2. and C.3. (page 36) and trying to figure out ramifications for Shell GP compliance.

I have an email into Mike Adams, EPA CID Anchorage, for a USCG contact in effort to see if USCG has past deck drainage concerns and if this potential Noble system is the result of USCG requests/regulations.

From: Cool, Richard
Sent: Monday, December 08, 2014 8:16 AM
To: 'Lana.Davis@shell.com'; 'Heather.Ptak@shell.com'
Cc: Seyfried, Erin; Shaw, Hanh
Subject: Discoverer deck drainage

Heather & Lana:

Thanks again for Friday's discussion. I found it helpful and hope that you felt progress was made.

After the meeting I attempted to write down the fact scenarios we discussed related to Discoverer deck drainage. In doing so I realized I may not have understood all details and permutations. Here is my summary of what I think might be in play factually and a couple of items merely for later discussion.

When your time permits, I would appreciate any information confirming what factually is or might be proposed.

In addition and for more context, it would be helpful for a summary description of what the clarifier does (its function) and in particular, does it treatment and/or remove some portion of oil & grease that might be in the diverted deck drainage. Any details about the clarifier (internal workings, etc.) would be helpful.

My recollection of what the vessel owner might be proposing is as follows:

•□□□□□ All deck drainage (i.e. contaminated and uncontaminated) would be directed to an oil-content metered Clarifier (15 ppm oil content discharge trigger).

•□□□□□ If Clarifier discharge is 15 ppm oil content or greater, the stream is diverted to an OWS which is also metered for 15 ppm oil content.

•□□□□□ OWS discharge would be at less than 15 ppm and sampled per NPDES permit provisions.

•□□□□□ [Note, we did not discuss NPDES permit implications for Clarifier discharge occurring at less than 15 ppm].

Here is my recollection of what I think an alternative discussion was about factually:

Direct any contaminated deck drainage (e.g. deck drainage with sheen, visible waste deposits, or suspected contamination) directly to the OWS [OWS discharge would be at less than 15 ppm oil content and sampled per NPDES permit provisions.]

Direct only uncontaminated deck drainage (i.e. no sheen, visible waste deposits or suspected contamination) to the Clarifier and if the Clarifier discharge is 15 ppm oil content or greater, the stream is diverted to an OWS for further treatment per discussion above.

[Note again, we did not discuss NPDES permit implications for Clarifier discharge occurring at less than 15 ppm].

Thanks again for any additional information you can provide.

Rick Cool

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